Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matters of	)	
	)	
Telecommunications Relay Services	)	CG Docket No. 03-123
and Speech-to-Speech Services for	)	
Individuals with Hearing and	)	
Speech Disabilities	)	
	)	
Structure and Practices of the	)	CG Docket No. 10-51
Video Relay Service Program	)	
	)	

RESPONSE TO SORENSON REPLY COMMENTS TO PETITION FOR RECONSIDERATION

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March 20, 2017

Response to Reply Comments to Petition for Reconsideration

On March 16th, 2017 Sorenson submitted reply comments in support of its Petition for Reconsideration of the Waiver order granting VTCSecure access to the telecommunications relay service Numbering Directory. While VTCSecure agrees with Sorenson Communications about the ability for the Deaf consumers to choose whether to use VRS or direct video calling, we disagree with the assumptions that "without additional safeguards, the Bureaus' ruling could preclude consumers from using Video Relay Services ("VRS") and force them to use only direct video calling ("DVC") to reach customer support services." VTCSecure would like to respond and hopefully ease any current or future concerns.

Let us be clear that there is no scenario where VTCSecure could permanently prevent a user from making a call to any organization using VRS. Users will ALWAYS have the choice to use VRS, even if the company's main number is placed in the iTRS database. Any user can always call their default provider first, and provide the phone number which the VRS provider would route over the PSTN as a regular VRS call. VTCSecure can not take this functionality away from any VRS provider or user even if the company's main number is in iTRS.

Throughout Sorenson's response they refer to VTCSecure as making the decision and "intending" to put main numbers in the iTRS database. VTCSecure does not or will not own the main number of any organization. It would be the organization who owns the number and is providing the deaf direct customer support that would request the number be placed into the iTRS database, not VTCSecure. The order simply gives VTCSecure the capability to enter the number into iTRS on behalf of the organization which, just like any number, would require an LOA from the organization. This legal safeguard is already in place. Any burdensome regulation concerning how a number is routed in the iTRS database will be a requirement placed on the organization that owns the number, not VTCSecure. It would be the organization attempting to provide a better, more functionally equivalent service to its customers/constituents who would be burdened with having to obtain a separate number as well as the significant cost to the organization for marketing a separate new number. It would disincentive companies to provide deaf to deaf call centers if they must now also pay to market a new number.

Sorenson also states that separate numbers for TTY should be the norm for providing services to the deaf and hard of hearing. In the past, TTY used a separate phone number because at the time TTY came out, call center systems were not able to take both voice calls and TTY calls on the same number. This required organizations to use a separate number and market a separate number to be in compliance. This was not done out of convenience for the deaf user. On the contrary, deaf users had to find the separate TTY number which is often very inconvenient. Luckily now with the new RTT ruling those needing to use TTY/RTT technology will no longer have to call a separate number like they have in the past. Now all these services can be combined into one number and ASL can be provided as another language option. Why would the government want to force organizations to continue to segregate deaf services to a separate number when a single number can provide all the options? Today when any hearing person calls a customer service number, they must first choose the access type and then

choose the language only after they have called the main number. Organizations who utilize VTCSecure's software would simply be providing ASL, VCO, HCO, Speech to text, Real Time text and other forms of services under a single number offering true functional equivalency.

Sorenson's reply mentions that "a VRS consumer should have alternatives in case the quality of the sign language at the called party is subpar " and so VRS must still be an option. VTCSecure has already stated VRS will ALWAYS be an option but that aside; having a customer service agent with subpar language skills would result in that agent being reported and possibly fired, which is functionally equivalent to an agent of any other language. We feel there is issue with assuming a hearing interpreter (who does not have to be nationally certified to work in VRS unfortunately) is going to provide better communication than a trained deaf customer service agent. If you argue that having an interpreter in the middle is beneficial in the case where an agent's ASL skills are subpar, then it's that much more important to allow the deaf user to have the choice of which kind of interpreter to use. A deaf user calling an organization through VRS may get an interpreter who is not certified and has no working knowledge of the common terms used by an organization. That same organization could provide an option to the user on the main number to use the organization's certified interpreter, who has full working knowledge of the organization's terms. Shouldn't the deaf user get to choose the interpreter provided by the organization if their skills are better than a possible uncertified, unfamiliar VRS interpreter?

Another assumption made is concerning VTCSecure becoming a "gatekeeper" for all calls to a particular organization. VTCSecure simply provides software. That software can be hosted in the cloud, or it can be installed on the organization's network using their own servers and their own internet connection. This would definitely be the case for someone like Social Security Administration (SSA) whose security rules would require the software be run on their own systems. Regardless of the location of VTCSecure's software, it is the organization that would be the "gateway" to all call logs and information, not VTCSecure. The same is true if the system goes down. In the case of SSA, it would not be VTCSecure that goes down, but SSA's servers or network hosting the call center software that goes down. This is the case with almost every call center deployed today. Would anyone argue the fact that everyone using a Cisco Call center system is allowing Cisco to be a gateway for all their calls? Or anyone using Oracle database software is making Oracle a gatekeeper of all their information? Would anyone also argue that when a hearing call center goes down it is the software provider's fault because that is the software the organization chose to use for its call center? VTCSecure is simply providing software which is purchased by the organization to provide services, so it is the organization who is in control of the customer access and the information. Again to be clear, it is not VTCSecure who is acting as the gateway, it is the organization who purchased VTCSecure's software or cloud service that is acting as the gateway.

In terms of the VTCSecure's "interface interfering with VRS providers billing practices", let us assure everyone that is not the case. Our platform can and will pass any information we receive, including the customer's IP address or 10 digit number. But we must also keep in mind that VRS users have IP addresses that are obtained through a VPN or a centralized corporate

network that currently are not always passed to the VRS provider. If this was a limitation to billing for VRS then hundreds of millions of VRS minutes would need to be reexamined to ensure the IP address the call came from was not through any other network. That fact aside, the organization has the option to configure VTCSecure's software to fully transfer the call so the original IP address would remain intact, and therefore eliminating the concerns raised about the IP.

Furthermore, if the call did remain through the organization's call center software, then the VRS minutes could be tracked. This would provide the FCC with a third party who has logs of how many VRS minutes went to a particular organization. This information, if volunteered by the organization or government agency, would allow the FCC to gain major insight into submitted VRS minutes. This could potentially help to identify waste, fraud and abuse.

In closing, the assumption that "VTCSecure" will somehow suddenly be in control of a company's services and customer service number as well as DVC taking away the ability for a user to choose to use VRS is simply incorrect. Both of those assumptions are candidly untrue, and current regulations already protect the user and require organizations to safely store their data. What is being suggested by forcing the DVC number to not be their main customer service number is taking the options away from the organization who is trying to provide better choices to their customers without limiting how they call those organizations today. It should be their choice what number or numbers they use to provide services. Deaf to deaf call centers are an added benefit to companies looking to provide new and innovative ways to provide support. It also results in the hiring of deaf employees and will potentially save millions from the fund. If the government wants to encourage companies and government agencies to implement this more functionally equivalent service then it shouldn't burden them with unnecessary costs and regulations. The goal with DVC is not to take away any current options or force its use but to offer the deaf community better, more functional equivalent options.